



Tom Barrett
Mayor

Bevan K. Baker, FACHE
Commissioner of Health

Health Department Office of the Commissioner

www.milwaukee.gov/health

Frank P. Zeidler Municipal Building, 841 North Broadway, 3rd Floor, Milwaukee, WI 53202-3653 phone (414) 286-3521 fax (414) 286-5990

November 9, 2017

Ross Stitely
Sherman Associates
233 Park Avenue South, Suite 201
Minneapolis, MN 55415

Dear Mr. Stitely:

Regarding the proposed "Barclay Project" (at 300 S. Barclay Ave, and 139 E Oregon St., Milwaukee, WI): The City of Milwaukee Health Department's (MHD) ongoing public health concerns regarding the proposed reconstruction and occupation remain. After consulting with the Wisconsin Department of Health Services (DHS), the Agency for Toxic Substances and Disease Registry (ATSDR), and the United States Environmental Protection Agency (EPA), Milwaukee Health Department (MHD) requested, in a letter dated July 27, 2017, that a plan be submitted to evaluate exposure hazards from documented and widespread contamination of building components from toxins including heavy metals, PCB's and some semi volatile organic compounds. This exposure could come about from activities/occurrences, such as cutting, drilling, abrasive action, demolition, or component deterioration, that disturb impregnated matrices. *As of this date, we have not received a plan from the Sherman Associates or their consultants that addresses this concern.*

Additionally, as previously discussed, an adequate plan would first have to robustly demonstrate safety not only for construction and maintenance workers, but also for future residents of the proposed development. To be clear, any plan to meet these concerns by restricting future building work that might disturb metal-impregnated matrices would not be viable, because compliance could not be adequately surveilled and enforced.

Short of removing toxins impregnated in building components, activity-based sampling necessary to demonstrate public safety is needed. Such a plan would include, but may not be limited to:

- *In situ* sampling/testing of air during activities noted above, including such as cutting, drilling, abrasive action, demolition, or component deterioration, that to approximate respiratory exposure to dusts reasonably expected to be generated from these activities.
- Sampling and analysis of settled dusts, after activities noted above, to assess hand-to-mouth ingestion and other possible exposure routes.

Based on the data submitted to the agencies to date, MHD, Wisconsin DHS, ATSDR, and EPA concur that respiratory protection, for metal bearing dusts, be employed for entry into interior areas where surfaces have not been cleaned, coated (or otherwise treated to eliminate dust hazards), and wipe-tested to confirm successful interim control of hazards from surface dust. It should be noted in that regard that any activities that may reintroduce dust from other areas, or disturb coated surfaces, would require a new process of interim controls and testing.

Adding to MHD's concerns are reports from the City of Milwaukee Department of Neighborhood Services (DNS) that unauthorized entry of the property and buildings continues after requests for additional security.

Think Health. Act Now!

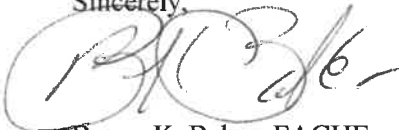


Until and unless adequate public health safeguards can be demonstrated, MHD, in consultation with the Wisconsin DHS, ATSDR, and EPA, does not recommend any activities or habitation except in compliance with and as authorized by a more comprehensive Health and Safety Plan, with the advisements above incorporated into the Health and Safety Plan. MHD does not recommend currently proposed reconstruction and occupation on the properties.

This letter is in no means intended to provide relief or to modify or extend the deadline for compliance with any orders from any other regulatory authority.

If needed MHD will continue to assist the DNS in any environmental health assessments that will affect any Milwaukee residents.

Sincerely,

A handwritten signature in black ink, appearing to read 'BK Baker', written over a circular stamp or seal.

Bevan K. Baker, FACHE
Commissioner of Health